



January 15, 2004

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Ex Parte Presentation
In the Matter of AT&T's Petition for Declaratory Ruling That AT&T's Phone-to-Phone IP Telephony Services
Are Exempt from Access Charges, WC Docket No. 02-361

In the Matter of Developing a Unified Inter-carrier Compensation Regime, WC Docket 01-92.

Dear Ms. Dortch:

On January 14, 2004, S. Michael Jensen, Michael Urdahl and Ken Pfister of Great Plains Communications, Inc. ("Great Plains") met with Christopher Libertelli, senior legal advisor to FCC Chairman Powell, and Lisa Zaina, senior legal advisor to FCC Commissioner Adelstein, on issues related to the above proceedings.

We presented Great Plains' views on AT&T's Voice over Internet Protocol ("VoIP") service and the importance that denial of this petition will have on universal service and rational inter-carrier compensation reform in rural areas. We urged that since the AT&T VoIP service utilizes other carriers' networks, there is a duty to compensate those carriers. We explained that not requiring the AT&T service, which clearly utilizes the Public Switched Telephone Network, to pay for that use will cause disarray to network and universal service cost recovery in rural areas.

Additionally, we noted that denial of the AT&T petition is a critical step to providing stability for rural carriers and rural customers while comprehensive, policy-based actions on all VoIP services and inter-carrier compensation are considered in the future. We further recommended that other pending VoIP service petitions should be dealt with in the FCC's ongoing inter-carrier compensation review process.

The attachment to this letter was referred to in the presentation. Consistent with Commission rules, one electronic copy of this letter and the attachment are being submitted for the record of both of the above-referenced dockets.

Sincerely,

Ken Pfister
Vice President-Strategic Policy

Attachments

Cc: Christopher Libertelli
Lisa Zaina